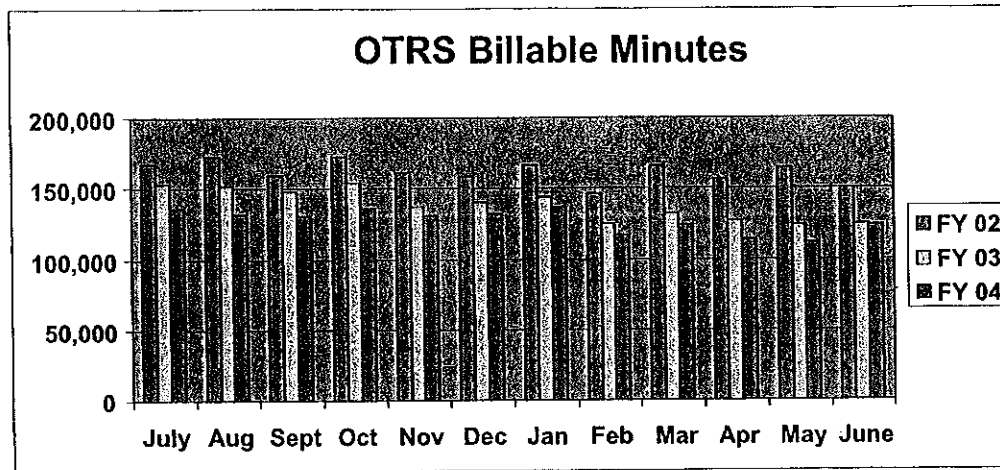


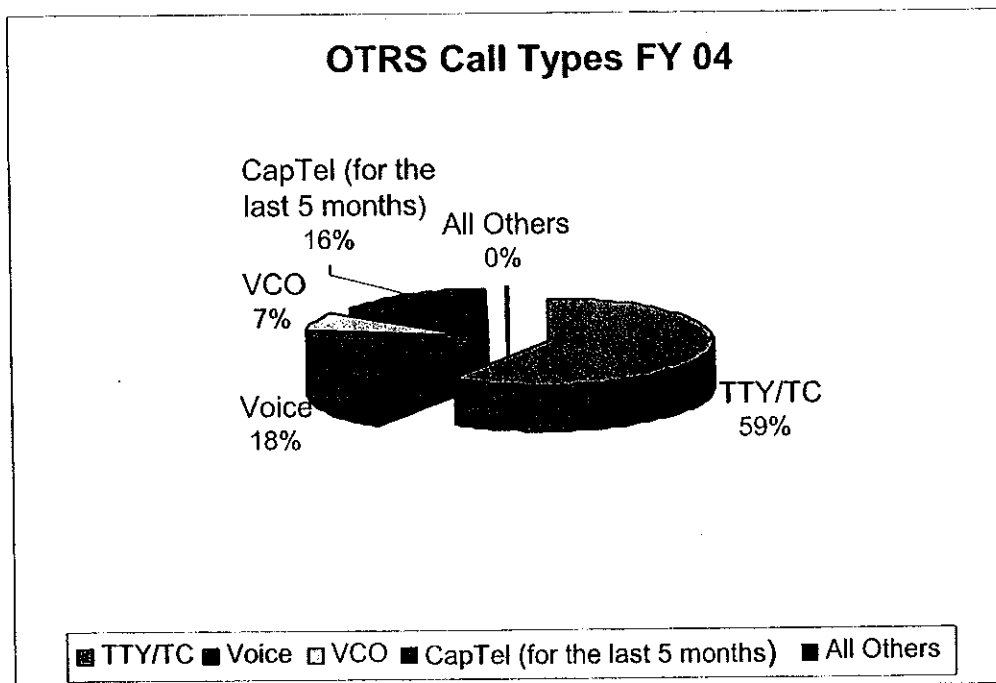


OTRS Billable Minutes:



OTRS Call Origination:

This chart indicates that TTY/Turbo Code users make up the majority of OTRS calls.





Customer Service Contact Data:

Sprint Customer Service is responsible for handling customer requests such as:

- ◆ Registering Customer Database profiles
- ◆ Responding to reports of technical issues
- ◆ Sending requested relay information materials
- ◆ Receiving customer suggestions, comments and complaints.

Each request from a relay user is given full attention and every effort is made to satisfy the user.

The following chart indicates the call types received through Sprint Customer Service.

	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	TOTAL
Complaints	1	2	2	1	4	2	2	3	4	1	3	0	25
Commendations	0	0	1	1	0	1	1	0	0	3	0	2	9
Inquiries	90	66	60	102	87	63	77	76	101	76	64	71	933
TOTAL	91	68	63	104	91	66	80	79	105	80	67	73	967

Recent statistics have shown that the TTY users submit the greatest number of complaints. Voice users are second, followed by VCO users. The most frequent types of complaints are: agent did not follow customer instructions, technical problems, and agent did not relay the calls properly. The most frequent commendation OTRS users made about the relay was that the agent did a great job relaying calls.

HCO	0	0	0	19	33	34	43	24	1	0	56	89	
Spanish	0	0	0	2	5	5	1	5	0	0	4	3	
ASCII & Baudot	83	65	54	2	14	0	1	0	2	2	0	0	
	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June	TOT
of Calls by Features													
VCO - VCO	0	0	1	3	1	1	2	0	0	2	1	0	
VCO - TTY	6	0	1	3	3	5	9	3	0	3	0	1	
TTY - VCO	0	1	0	0	2	0	5	1	0	0	0	0	
VCO - HCO	0	0	0	0	0	0	0	0	0	0	0	0	
HCO - HCO	0	0	0	0	0	0	0	0	0	0	0	3	
HCO - TTY	0	0	0	0	0	0	1	0	0	0	0	0	
TTY - HCO	0	0	0	0	0	0	0	0	0	0	0	0	
HCO - VCO	0	0	0	0	0	0	0	0	0	0	0	0	
Mach. Retrieval	0	11	3	0	5	3	1	0	5	3	8	0	
	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June	TOT
Percentage of Calls													
TTY	27.91%	27.71%	24.95%	24.77%	24.98%	24.15%	25.13%	24.92%	23.44%	23.24%	24.90%	23.74%	
TC Calls	42.94%	43.11%	43.79%	44.60%	44.44%	45.33%	46.00%	43.68%	44.96%	44.43%	45.31%	46.08%	
ASCII	0.09%	0.08%	0.08%	0.12%	0.11%	0.21%	0.10%	0.05%	0.17%	0.15%	0.25%	11.00%	
Voice	21.42%	20.96%	23.11%	22.27%	22.48%	21.12%	20.37%	22.67%	22.38%	22.62%	20.66%	21.44%	
VCO	7.47%	8.00%	8.27%	8.20%	7.90%	9.11%	8.30%	8.62%	9.04%	9.56%	8.75%	8.43%	
HCO	0.00%	0.00%	0.00%	0.04%	0.07%	0.07%	0.09%	0.06%	0.00%	0.00%	13.00%	0.20%	
D/B ASCII	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
D/B Baudot	0.17%	0.14%	0.11%	0.00%	0.03%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
H OF WORK TIME													
Work min - Inbound	5.09	5.08	4.95	5.17	5.04	5.04	5.01	4.96	4.98	4.86	4.9	5.03	
Up minutes - Inbound	0.5	0.5	0.5	0.5	0.5	0.5	0.49	0.49	0.5	0.5	0.5	0.5	
Minutes - Inbound	3.64	3.68	3.59	3.74	3.67	3.69	3.66	3.63	3.61	3.52	3.51	3.65	
Minutes - Outbound	4.51	4.52	4.46	4.56	4.63	4.67	4.61	4.62	4.64	4.52	4.42	4.58	
Up minutes - Outbound	0.15	0.15	0.14	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	
Minutes - Outbound	3.26	3.27	3.23	3.31	3.38	3.42	3.37	3.38	3.37	3.27	3.17	3.33	
H OF CALL BY DEVICE													
TTY	3.35	3.41	3.43	3.49	3.57	3.55	3.51	4	4.04	4.08	3.31	4	
Spanish	2.39	3.49	4.02	3.2	4.22	4.29	4.29	7.01	3.3	2.37	1.36	0.32	
Speech Imp.	6.54	6.34	6.16	6.39	6.18	6.29	5.36	6.13	6.07	6.02	4.58	5.01	
Turbo code	3.25	3.22	3.24	3.25	3.3	3.3	3.19	3.24	3.25	3.19	3.11	3.22	
Spanish	3.34	3.37	4.02	3.32	4.35	3.08	2.27	2.06	2.48	3.49	3.59	3.54	
Speech Imp.	4.48	5.21	6.48	8.01	7	7.13	6.31	6.34	6.36	5.35	5.28	5.23	
ASCII	4.51	3.92	4.37	3.83	3.34	3.86	3.41	3.94	3.93	3.46	4.32	4.01	
Spanish	0	0	0	0	0	0	0	0	0	0	0	0	
Speech Imp.	0	0	0	0	0	0	0	0	0	0	0	0	
VOICE	2.11	2.13	2.05	2.09	2.14	2.23	2.3	2.14	2.13	2.12	2.19	2.11	
Spanish	2.23	3.42	2.47	0.06	3.45	2.09	60.4	0	1.53	2.03	0.37	2.52	
VCO	4.09	4.08	4.06	4.13	4.07	4.03	4.19	4.27	4.05	3.27	4.04	4.03	
Spanish	0	5.41	0	0	0.39	0	0	3.41	0.38	0	0	0	
HCO	0	0	0	4.32	4.19	4.22	4.33	6.4	14.01	0	4.01	4.43	
Speech Imp.	0	0	0	2.15	7.5	2.07	11.45	3.17	0	0	8.24	12.23	
D/B ASCII	0	0	0	0	0	0	0	0	0	0	0	0	
D/B Baudot	2.16	2.19	2.37	2.5	0.55	0	7.22	0	5.49	0	0	0	

								Feb	Mar	Apr	May	June	TOTAL
OF PHONE								176	145	174	119	132	
OF CALLS								4,142	3,994	4,113	4,995	5,623	22
								620	780	676	697	924	3
REL SERVICE								19,097	17,080	19,213	23,230	25,358	103
s								17,582	15,670	17,266	20,735	22,272	93
Minutes													
S								4.01	3.58	3.8	3.43	3.45	3.70
								3.69	3.28	3.46	3.07	3.03	3.31
s													
ACTS								0	1	1	2	3	
								0	0	0	0	0	
								0	1	1	2	3	

Forecast Statistics

	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June	TOTAL
SERVICE													
Available Minutes	135,594	131,587	131,085	136,002	131,376	131,917	136,734	116,821	123,638	113,318	111,929	124,322	9
Speech Billable Min	156	167	103	154	169	248	160	17	386	133	88	465	
	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June	TOTAL
CALLS BY DEVICES													
Minutes	46,099	45,264	40,646	42,390	40,769	39,661	42,706	41,268	41,628	39,192	34,348	42,392	
Minutes/ FY 05	46,560	45,717	41,052	42,813	41,777	40,057	43,133	41,681	42,044	39,584	34,691	42,816	
of TTY calls	13,761	13,274	11,850	12,146	11,420	11,172	12,167	10,317	10,304	9,606	10,377	10,598	
average per min	3.35	3.41	3.43	3.49	3.57	3.55	3.51	4	4.04	4.08	3.31	4	
Minutes	1,448	942	872	714	687	924	493	147	350	19	30	4	
Minutes/ FY 05	1,463	952	881	721	694	933	498	149	353	19	30	4	
Spanish TTY calls	606	270	217	223	202	219	115	21	106	8	22	11	
average per min	2.39	3.49	4.02	3.2	3.4	4.22	4.29	7.01	3.3	2.37	1.36	0.32	
Minutes	3,080	3,157	3,326	3,054	3,751	3,120	2,943	3,188	2,847	2,083	1,557	2,224	
Minutes/ FY 05	3,111	3,189	3,360	3,085	3,789	3,151	2,972	3,219	2,875	2,104	1,573	2,247	
Speech Imp. Calls	471	498	540	478	607	496	549	520	469	346	340	444	
Imp. average per min	6.54	6.34	6.16	6.39	6.18	6.29	5.36	6.13	6.07	6.02	4.58	5.01	
Minutes	68,806	66,487	68,208	71,078	67,053	69,194	71,060	58,582	64,240	58,588	58,723	66,248	
Minutes/ FY 05	69,494	67,151	68,891	71,788	67,723	69,886	71,771	59,168	64,882	59,173	59,310	66,911	
Turbo Code Calls	21,171	20,648	21,052	21,870	20,319	20,968	22,276	18,081	19,766	18,366	18,882	20,574	1
average per min	3.25	3.22	3.24	3.25	3.3	3.3	3.19	3.24	3.25	3.19	3.11	3.22	
Minutes	651	445	535	611	413	197	422	76	360	628	510	690	
Minutes/ FY 05	658	449	540	617	417	199	426	77	363	634	515	697	
Spanish TC calls	195	132	133	184	95	64	186	37	145	180	142	195	
average per min	3.34	3.37	4.02	3.32	4.35	3.08	2.27	2.06	2.48	3.49	3.59	3.54	
Minutes	2,625	2,402	3,564	3,725	4,396	3,308	3,767	2,701	3,294	3,290	2,402	2,568	
Minutes/ FY 05	2,652	2,426	3,600	3,762	4,440	3,341	3,805	2,728	3,327	3,323	2,595	2,594	
Speech Imp. TC calls	586	461	550	465	628	464	597	428	518	615	455	491	
Imp. average per min	4.48	5.21	6.48	8.01	7	7.13	6.31	6.34	6.36	5.35	5.28	5.23	
Minutes	194	149	162	226	164	378	171	87	299	211	449	205	
Minutes/ FY 05	196	150	163	228	165	409	184	94	323	228	485	221	
of ASCII calls	43	38	37	59	49	98	50	22	76	61	104	51	
average per min	4.51	3.92	4.37	3.83	3.34	3.86	3.41	3.94	3.93	3.46	4.32	4.01	
Minutes	22,282	21,383	22,771	22,829	21,997	21,789	22,690	20,080	20,955	19,826	18,856	20,197	
Minutes/ FY 05	22,504	21,597	22,999	23,057	22,217	23,532	22,916	20,280	21,164	20,025	19,044	20,399	
of Voice calls	10,560	10,039	11,108	10,923	10,279	9,771	9,865	9,383	9,838	9,352	8,610	9,572	
average per min	2.11	2.13	2.05	2.09	2.14	2.23	2.3	2.14	2.13	2.12	2.19	2.11	
Minutes	51	51	22	1	41	19	655	0	18	18	1	35	
Minutes/ FY 05	52	52	22	1	42	19	662	0	19	18	1	36	
of Spanish calls	23	15	9	14	12	9	13	0	12	9	3	14	
average per min	2.23	3.42	2.47	0.06	3.45	2.09	50.4	0	1.53	2.03	0.37	2.52	
Minutes	15,059	15,554	16,139	16,598	14,693	16,978	16,840	15,231	16,087	12,930	14,730	15,177	
Minutes/ FY 05	15,210	15,709	16,300	16,764	14,840	17,148	17,008	15,383	16,247	13,059	14,877	15,329	
of VCO calls	3,682	3,831	3,975	4,019	3,610	4,213	4,019	3,567	3,972	3,954	3,646	3,766	
average per min	4.09	4.06	4.06	4.13	4.07	4.03	4.19	4.27	4.05	3.27	4.04	4.03	

tes	0	27	0	0	1	0	0	3	1	0	0	0	
minutes/ FY 05	0	27	0	0	1	0	0	3	1	0	0	0	
Spanish calls	0	5	0	0	3	0	0	1	2	0	0	0	
average per min	0	5.41	0	0	0.39	0	0	3.41	0.38	0	0	0	
tes	0	0	0	82	138	143	186	154	14	0	225	394	
minutes/ FY 05	0	0	0	83	140	145	188	155	14	0	227	398	
HCO calls	0	0	0	19	33	34	43	24	1	0	56	89	
average per min	0	0	0	4.32	4.19	4.22	4.33	6.4	14.01	0	4.01	4.43	
tes	179	142	128	5	8	0	7	0	11	0	0	0	
minutes/ FY 05	181	144	129	5	8	0	7	0	11	0	0	0	
Call & Baudot calls	83	55	54	2	14	0	1	0	2	2	0	0	
average per min	2.16	2.19	2.37	2.5	0.55	0	7.22	0	5.49	0	0	0	
Total	160,476	156,004	156,373	161,312	154,111	155,713	161,940	141,517	150,103	136,786	131,831	150,134	
ation FY 05	162,081	157,564	157,937	162,925	155,652	158,822	163,571	142,938	151,625	138,168	133,349	151,650	
tes	1,020	1,186	634	984	1,044	1,560	858	103	2,343	799	404	2,331	
minutes/ FY 05	1,030	1,197	641	994	1,055	1,576	866	104	2,367	807	408	2,354	
Speech Billable Min	156	187	103	154	169	248	160	17	386	133	88	465	
per minutes	6.54	6.34	6.16	6.39	6.18	6.29	5.36	6.13	6.07	6.02	4.58	5.01	
	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June	TOTAL
Y 05													
Billable Minutes	140,000	140,000	140,000	140,000	140,000	140,000	140,000	140,000	140,000	140,000	140,000	140,000	1,680,000
able Minutes	135,594	131,587	131,085	136,002	131,376	131,917	136,734	116,821	123,638	113,318	111,929	124,322	1,524,000
nces + or -	4,406	8,413	8,915	3,998	8,624	8,083	3,266	23,179	16,362	26,682	28,071	15,678	156,000

es for OTRS \$159,506.25 \$154,834.45 \$192,722.31 \$182,625.71 \$177,702.85 \$180,104.35 \$180,138.72 \$157,503.15 \$180,265.73 \$150,242.10 \$165,299.96 \$173,027.59 1,706,000

Note: CapTel is not included. CapTel forecast statistics will be included in the next year's annual report.

Supporting TDAP Team (As of June 1, 2004):



Telecommunications Devices Access Program Advisory Council	
Damara Paris RSPF Telecommunication Manager	Vicki McLean CSD Administrator
Board Members	
Bill Drobkiewicz Chair - Deaf Representative	Renwick Dayton Deaf Representative
Shirl Garcia Vice Chair – Speech Impaired Representative	Clark Jackson OPUC Representative
BettySue Bischoff Hard of Hearing Representative	Lizzie McNeffe Mobility- Impaired Representative
Andrea Cabral Hard of Hearing Representative	Ishai Rosen Deaf Representative
Bob Case Deaf Representative	Brant Wolf Industry Representative Oregon Telephone Association (OTA)
Cheryl Davis Professional Representative	Vacant Deaf-Blind or Deaf/Hard of Hearing Representative
OTRS Outreach Vendors	
Pennie Trumbull, The Marketing Director OTRS Marketing Service	Nancy Hammons CapTel Outreach Coordinator

Sprint Industry Report:



New Products for Sprint Relay

2003 was an exciting year for Sprint. We introduced an enhanced VCO product: Captioned Telephone, better known as CapTel. Sprint implemented CapTel trials in nine states, one of which was the State of Oregon. CapTel received very good reviews from the trial participants. On February 1, 2004, the State of Oregon amended its TRS contract to add this innovative TRS product.

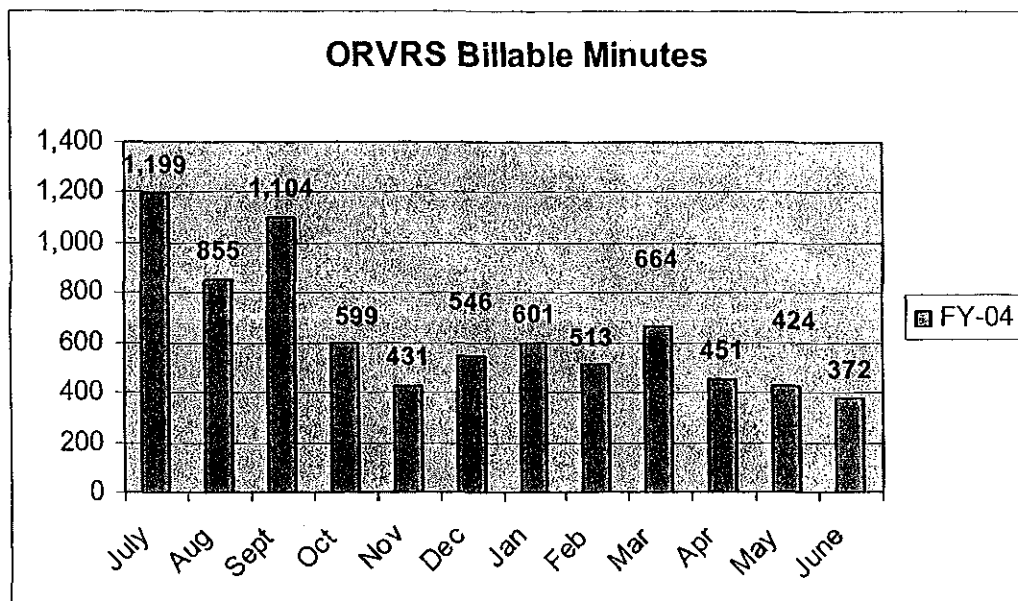
Sprint also implemented several key enhancements to Sprint Relay Online (internet relay) and Video Relay Service, and the development of the NextGen SS7 platform is underway.

The Sprint Relay Marketing teams have gone above and beyond to increase awareness of these exciting new products across the country by offering extensive hands-on product training and demonstrations at trade shows, state events, and non-profit organizations, as well as with business associates and individuals. Our team strongly believes in keeping relay users informed of all new technologies.

1. Video Relay Service

Sprint and Communications Services for the Deaf (CSD) established an alliance to offer **Video Relay Service (VRS)** nationwide, available on the Internet at www.sprintvrs.com and www.orvrs.com. VRS is an interactive video teleconferencing service that uses a sign language interpreter to relay calls between sign language users and standard phone users without a TTY. Currently, all VRS minutes are reimbursed through the Interstate TRS Fund for both Interstate and Intrastate calling. Sprint established state URLs for VRS to provide historical data on VRS minutes processed through individual states' websites. The purpose of the individual website was to have a report generated so that administrators can try to forecast the number of VRS minutes in the event that the FCC mandates VRS as part of the TRS service. In addition, Sprint established a webcam distribution program to further enable potential users video relay access.

The chart indicates the trends of the VRS annual call volume via www.ORVRS.com. These numbers reflect the availability and usage of new technology provided by Sprint. For the past year, we experienced a decline in VRS call volume due to a growth in competing VRS providers. Also, OPUC requested that Sprint separate VRS/SRO from all OTRS marketing outreach.



2. Sprint Relay OnlineSM

On July 8, 2002, Sprint introduced **Sprint Relay Online** – www.sprintrelayonline.com. This web-enabled, multi-language service is the next generation of relay. Sprint Relay Online calls are made through the Internet, rather than a TTY, so calls can be made anywhere, anytime, to anyone. There's no charge for long distance calls when using Internet Relay service. This cutting edge technology ensures that relay users receive high quality, secure and confidential communication, and provides an interactive relay experience using intuitive features designed for the unique needs of the TRS users.

The adaptive display of Sprint Relay Online gives relay users the ability to customize their computer screen appearance for enhanced readability. The print/save options allow the users the capability to print out or save their own conversations for future reference.

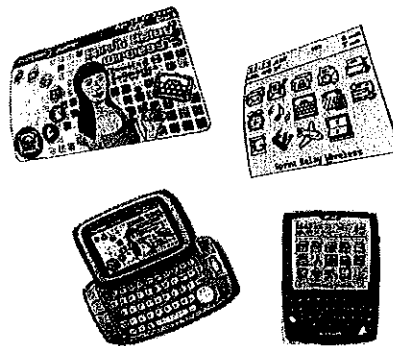


3. Sprint Relay Wireless

May 5, 2004—Sprint announced Sprint Relay Wireless powered by GoAmerica, the provider of WyndTell service. Sprint Relay Wireless enables users, for the first time, to connect to Sprint Relay OnlineSM from virtually anywhere using a choice of wireless handheld devices and pagers as easily as connecting to Sprint Relay Online from a computer.

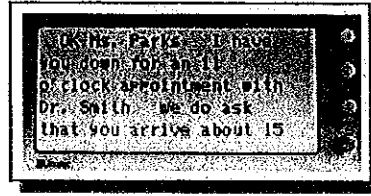
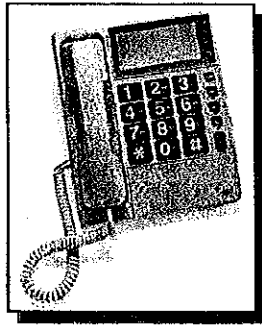
Sprint Relay Wireless blends the easy-to-use capabilities of Sprint Relay Online with the power of WyndTell service. The service is available through the RIM 950, RIM 850, and RIM 857 pagers running WyndTell or Deafwireless service.

Users of the RIM devices can access Sprint Relay Wireless by choosing "Relay" in the service's TTYchat feature. Then they simply choose a number to be dialed from their address book, or enter a new number. Once entered, the call proceeds as a standard relay call with the operator and user interacting on the wireless device, as they would on a computer connected to Sprint Relay Online. RIM users also can copy and paste or save transcripts of their own relay conversations.



4. Integration of Captioned Telephone Technology Applications (CapTel)

Sprint and Ultratec, Inc., a manufacturer of TTY equipment, are partnering to provide **Captioned Telephone (CapTel)**. After conducting trials in 2003, we're proud to have launched our full-service, FCC-compliant CapTel in the Spring of 2004. The objective of the CapTel system is to provide near-functionally equivalent telephone service for people who are deaf or hard of hearing who can use their own voice to talk to the called party. The CapTel system sends both the called party's voice over an amplified handset, and the near-simultaneous transcription of the words that the called party is saying (captions) to the user.



How it works:

The CapTel user simply dials the number of the person they are calling directly on their CapTel phone. The CapTel phone automatically links into the CapTel service. When the called party answers, the conversation proceeds naturally with the user and the called party speaking to each other. Using state-of-the-art voice recognition technology, the captions on the CapTel phone flow at standard rate of speech, with over 98% accuracy, about two or three seconds behind the called party's voice. The called party's voice is transmitted to the user via an amplified handset and the captions are presented on a bright, five-line display screen. The user has the capability of scrolling back in the conversation to read captions that may have been missed.

Sprint is currently providing CapTel service in 12 states. Sprint and Ultratec, Inc. believe that CapTel has the potential to dramatically change the way individuals experience relay service.

5. Relay Conference Captioning

RCC, developed by Sprint and Caption Colorado, combines real-time captioning with relay conference service to enable deaf and hard-of-hearing individuals to fully participate in conference calls. RCC is currently provided in Arkansas, North Carolina and through the Federal Relay Service.

RCC uses the same high-quality stenocaptioners that provide closed captioning for live television, news, sports and weather. Real-time text is streamed to an Internet-connected computer anywhere in the world, and does not require a high-speed Internet connection -- dial-up (56k) will work. RCC has user-friendly features including:

- Language preferences (English or Spanish)
- Background color options
- Text color/size options
- Text transcript of teleconference conversation
- Online customer support
- New features under development

6. NextGen TRS Platform

Sprint is excited to announce that we are in process of rolling out our next generation (NextGen) TRS platform at our relay centers. The deployment of the NextGen Platform will continue into 2005. The NextGen Platform incorporates the latest in telephone switching and data transport technology. Sprint has invested more than \$12 million in the new platform. When completed, this upgrade will replace virtually the entire TRS platform with the best technology available. When combined with recently upgraded Communication Assistant (CA) terminals and a new desktop call processing application, the result will be a state-of-the-art, highly flexible, easily modified, unbeatable combination to support Sprint's superior relay services.

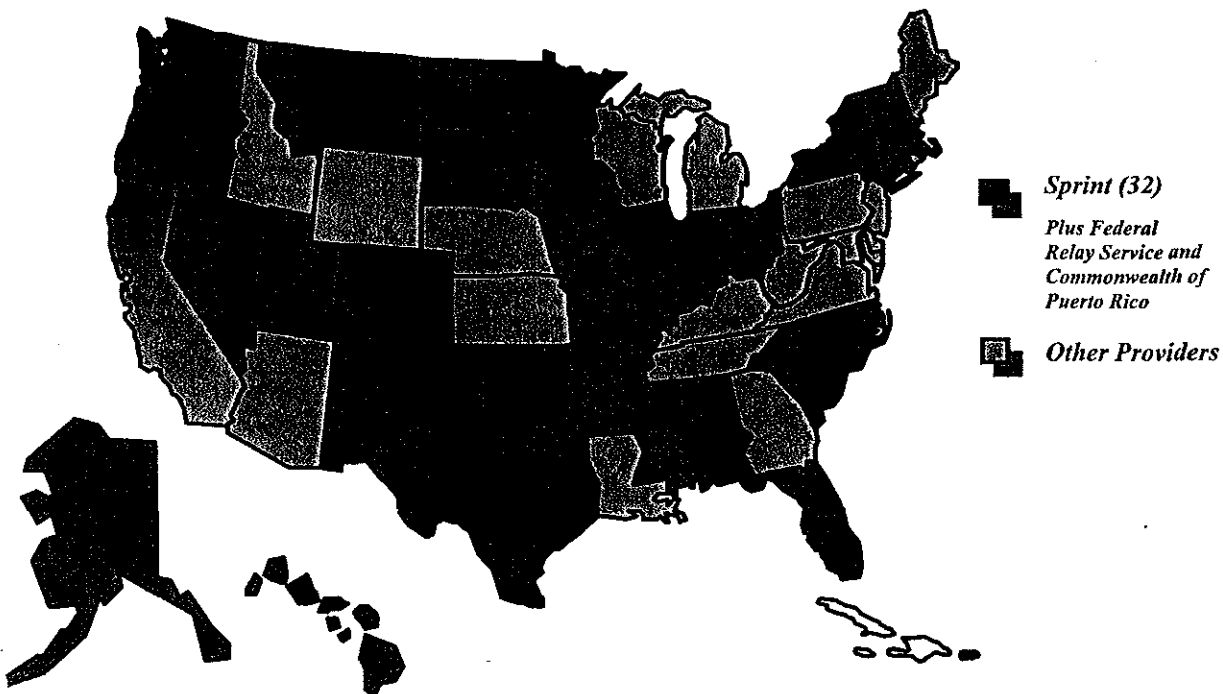




Sprint Relay Accounts:

Sprint currently provides relay services to 32 states, the Federal Government, and the Commonwealth of Puerto Rico. In 2004, Sprint was awarded three new state TRS contracts to provide relay services for Massachusetts, Alabama, and Arkansas and one new international contract for New Zealand. We also were awarded contract renewals for Oregon, North Dakota, New York, North Carolina and the Federal Relay Service. We also added three in-state centers to the Sprint Relay Network in Columbia, South Carolina; Holyoke, Massachusetts; and Honolulu, Hawaii. Sprint is proud of the continued growth and success of our relay program.

From July 31, 2003 to June 30, 2004, Sprint processed over 26 million inbound calls and has met or exceeded all operational service levels (average speed of answer, blockages, etc.) for all 32 states, the Federal Government, and Puerto Rico. The network reliability was 99.70% (measuring consistency of service).



Supporting Sprint Team:



Sprint Government System Division (GSD)	
Tony D'Agata Vice President & General Manager Sprint GSD	Mike Ligas Vice President Sprint TRS
Mike Ellis Director, TRS Sales Sprint TRS	Paul Ludwick Director, Business Development Sprint TRS
Business Service Operations	Government Systems Division
<u>TRS Operations</u> Lori Lockhart Director of TRS Operations Ron Peay Manager Vendor Sub-Contracts Mary Cole Program Manager <u>Billing</u> Fabiola Maxwell Billing Analyst <u>Engineering</u> Cyndi Novak Team Leader TRS Design & Development Ron Edwards Manager Test & Implementation Delwin Coleman Regional Manager System Maintenance	<u>Marketing</u> Aparna Lele OTRS Account Manager John Moore Manager, Customer Relations Western Region Accounts Michael Baer Program Manager <u>Sales</u> Sharaine Rawlinson Senior Government Account Manager <u>Contracts</u> Don Rawlings Senior Contract Administrator

FCC Reviewing Comments and Orders
FCC Second Report and Order
Mandatory Minimum Standards and Compliance Matrix

FCC Order Ref. 03-112	FCC Requirement	Sprint's Comment
Availability of SS7 Technology to TRS Facilities	Concluded that TRS providers should have access to SS7 or similar technology to make Caller ID and other benefits available and facilitate provision of TRS. (§16)	Sprint supports this requirement and is implementing the SS7 technology in its NextGen platform rollouts in 2004 – 2005.
	Concluded that TRS providers are required to observe FCC's rules pertaining to Caller ID and call blocking services. (§22)	Sprint will comply.
Transmittal of Calling Party Information	Concluded that when a TRS facility is able to transmit any identifying information to the network, the TRS facility must pass through, to the called party, the number of TRS facility, 711, or, if possible, the 10-digit number of the calling party. The identifying information passed through the TRS facility to the called party is to be determined by the TRS Provider. (§25)	Sprint's position is to transmit the 10-digit number and to recognize the ID blocking indicators through SS7 technology.
Types of Calls	Concluded that the following call types are adopted as mandatory minimum standards of TRS.	The VCO and HCO calling combinations have been standard features of Sprint's since 1996.
	Two Line VCO Two Line HCO HCO-to-TTY HCO-to-HCO VCO-to-TTY VCO-to-VCO	
	Concluded that these types of TRS calls are required to be provided on an interstate and intrastate basis within six months of publication of this Order in the Federal Register (8/24/03). (§27)	Having these features as part of Sprint's standard TRS platform, Sprint exceeded this requirement to meet the February 24, 2004 implementation deadline.
	This requirement is waived for Internet Relay and Video Relay Services through December 31, 2007. (§36)	
Handling of Emergency Calls	Concluded that TRS providers must use a system for incoming emergency TRS calls that at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point. (§38)	Sprint is investigating the capabilities of its E911 database to meet the requirement to transfer emergency calls to an "appropriate" PSAP. A Petition for Reconsideration of this requirement has been filed by AT&T and Verizon bringing up questions as to the reliability and availability of information available to TRS providers.
	Required that all TRS facilities be able to pass emergency callers to the appropriate PSAP within twelve months of publication of this Order in the Federal Register (8/24/03). (§42)	Further clarification on this issue is expected from the FCC soon. Until such time, Sprint continues to investigate methodologies to comply with this requirement.

	This requirement has been waived for Internet Relay and Video Relay Services (under separate Orders for SRO and VRS)	The implementation deadline for this feature was August 24, 2004 but it is expected that this will change with the FCC's pending response.
Answering Machine Message Retrieval	This feature allows a TTY user to retrieve voice messages left on his or her voice mailbox or voice answering machine by an incoming call from a third party.	Sprint has provided Answering Machine Retrieval since 1996. Sprint exceeded the requirement to meet the February 24, 2004 implementation deadline.
	Concluded that answering machine and voice mail retrieval are TRS features that must be provided to TRS users. (§65)	
	Concluded that answering machine retrieval must be provided on an interstate and intrastate basis within six months of publication of this Order in the Federal Register (8/24/03). (§62)	
Call Release	Call release allows a CA to set up a TTY-to-TTY call that once set up does not require the CA to relay the conversation. The feature allows the CA to sign-off or be "released" from the line without triggering a disconnection between two TTY users after the CA connects the originating TTY caller to the called party's TTY. (§68).	Sprint implemented the Call Release feature on July 1, 2003 and extended this functionality to all States on February 24, 2004.
	Concluded that call release is required under FCC's functional equivalency mandate. (§69)	
	Ruled that once the CA signs off, or is "released," after the two TTY parties are connected, it is the call ceases to be a TRS call subject to the per-minute reimbursement. (§68)	Once a call is "released" from the CA workstation, the call is no longer a relay call and accordingly will not be charged to the state customer.
	Concluded that call release must be provided on interstate and intrastate basis within six months of publication of this Order in the Federal Register (8/24/03). (§62)	
	This requirement is waived for Internet Relay and Video Relay Services. (§76)	
Speed Dialing	Speed dialing allows users to manually store a list of telephone numbers with designated speed dialing codes in the TRS user's consumer profile.	Sprint currently provides up to ten speed dial entries to be stored in the Customer Database. After the deployment of Sprint's NextGen SS7 platform, relay users will have opportunity to store as many speed dialing numbers as they need.
	Concluded that the speed dialing must be provided on an interstate and intrastate basis within six months of publication of this Order in the Federal Register (8/24/03). (§71)	Sprint exceeded the requirement to meet the February 24, 2004 implementation deadline. Speed Dialing or Frequent Dialed Numbers has been a standard feature of Sprint's since September 1, 1996.
	This requirement is waived for	

	Internet Relay and Video Relay Services.(¶76)	
Three-way Calling	<p>Three-way calling feature is generally arranged in one of two ways. (¶73)</p> <p>1. The TRS consumer may request that the CA set up the call with two other parties or;</p> <p>2. The TRS user may connect to two telephone lines at the same time from his or her premises by using the telephone's switch hook (or "flash") button.</p> <p>Concluded that the three-way calling must be provided on an interstate and intrastate basis within six months of publication of this Order in the Federal Register (8/24/03). (¶62)</p> <p>Concluded that cost recovery shall be based on the time that CAs spend facilitating calls, rather than the time that circuits are completed.</p> <p>This requirement is waived for Internet Relay and Video Relay Services.(¶76)</p>	<p>Sprint has provided three-way calling capabilities, from the customer's premises, since September 1, 1995. FCC has acknowledged that Sprint's methodology for providing three-way calling capability meets this requirement. Sprint will continue to support three-way call capability from the customer's premises.</p> <p>Sprint exceeded the requirement to meet the February 24, 2004 implementation deadline.</p>

FCC CapTel Mandatory Minimum
Standards & Compliance Matrix
As of August 1, 2003

FCC 03-112 Appendix D Final Rules	FCC Requirement	FCC CapTel Declaratory Ruling (FCC 03-190)	Sprint's Commitment
Provision of Services			
§ 64.603	<p>Each common carrier providing telephone voice transmission services shall provide, no later than July 26, 1993, in compliance with the regulations prescribed therein, throughout the area in which it offers services, telecommunications relay services, individually, through designees, through a competitively selected vendor, or in concert with other carriers.</p> <p>Speech-to-Speech relay service shall be provided by March 1, 2001.</p> <p>Interstate Spanish language relay service shall be provided by March 1, 2001.</p> <p>In addition, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.</p>	<p>The Communications Act defines TRS as "telephone transmission services that provide the ability for an individual who has hearing or speech impairment to engage in communication by wire or radio with a hearing individual in a manner that is functionally equivalent to the ability of an individual who does not have a hearing impairment or speech impairment to communicate using voice communication services by wire or radio." Since TRS calls handled via captioned telephone VCO service fall squarely within this definition – i.e. they allow communications between persons with hearing or speech disabilities and persons without such disabilities – we conclude that captioned telephone VCO service falls within statutory definition of TRS. (¶17)</p>	<p>Sprint has been a CapTel provider, on a trial basis, since May 1, 2002. On January 1, 2004, Sprint successfully converted CapTel trial into a FCC-compliant CapTel service, the first -ever in the TRS Industry.</p> <p>Speech-to-Speech relay service for CapTel is waived by the FCC. See Section 64.604 A.3.</p> <p>Sprint was also the first CapTel provider to offer intrastate and interstate Spanish services on January 1, 2004.</p> <p>711 for CapTel is temporarily waived for one year. See Section 64.604 A.3.</p>
Operational standards			
§ 64.604 A.1	<p>Communications Assistant (CA) Competency Skills</p> <p>CAs are to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.</p> <p>CAs must have competent skills in typing, grammar, spelling, and interpretation of typewritten ASL, familiarity with hearing and</p>	<p>Requirement applies.</p> <p>Use of CapTel's voice recognition software "is a permissible means ...for achieving the CA's</p>	<p>Sprint requires that all CapTel CAs have a high school diploma or graduate equivalency as a minimum qualification for the job.</p> <p>All CapTel CAs are tested and competent</p>

	<p>speech disability cultures, languages, and etiquette.</p> <p>Typing Speed – 60 WPM with technological aids</p> <p>Oral-to-type tests</p>	<p>competency skills required by the TRS mandatory minimum standards" (§39). Interpreting typed ASL is not applicable.</p> <p>Use of voice recognition technology in the provision of CapTel VCO service "is a permissible means for ... enhancing transmission speed..." (§39)</p> <p>Waived. Permits use of oral-to-text tests instead.</p>	<p>in typing, grammar, and spelling to ensure skills meet the following FCC Guidelines. CapTel CA training provides familiarity with hearing, deaf, and speech-disabled cultures.</p> <p>CapTel's voice recognition technology transmits above 100 WPM.</p> <p>Oral-to-text tests are given to all CapTel CAs</p>
§ 64.604 A.2	<p>Confidentiality & Conversation Context</p> <p>CAs are prohibited from disclosing the content of any relayed conversation regardless of content</p> <p>CAs are prohibited from intentionally altering a relayed conversation and must relay all conversation verbatim unless specifically requested to do otherwise</p>	<p>Requirement applies.</p> <p>Requirement applies.</p>	<p>CapTel CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided.</p> <p>CapTel CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim.</p>
§ 64.604 A.3	<p>Types of Calls</p> <p>CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.</p>	<p>Waived for outbound calls (§ 46) because the CapTel CAs are not involved in call set up and cannot refuse the call (§46)</p> <p>Not waived for inbound calls to a CapTel user made through a TRS facility. However, if call is made directly to the captioned telephone access number, no set up is involved and the CapTel CA cannot refuse to</p>	<p>CapTel users dial sequential calls directly therefore there is no way for a CapTel CA to refuse sequential calls or limit length of calls.</p> <p>CapTel will not refuse single or sequential inbound calls or limit the length of calls utilizing the service. If an inbound call is made to a captioned telephone user via the captioned</p>

	<p>TRS shall be capable of handling any type of call normally provided by common carriers and can decline calls if credit card authorization is denied.</p>	<p>call (§46).</p> <p>Requirement applies.</p> <p>Note: The requirement to provide 711 dialing is waived for outbound calls made from a CapTel phone. Inbound 711 calling waived for one year (8/1/03 – 7/31/04).</p> <p>Also STS and HCO are waived (§29).</p>	<p>telephone access number, set-up is automatic, and thus there is no way for a CA to refuse the call.</p> <p>CapTel is capable of handling all call types normally provided by common carriers. Inbound 711 calls can be processed as of 8/1/04.</p>
<p>§ 64.604 A.4</p>	<p>Handling of Emergency Calls</p> <p>Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to the nearest PSAP.</p> <p>A CA must pass along the caller's number to the PSAP when a caller disconnects before being connected to emergency services.</p>	<p>Requirement applies.</p> <p>Requirement applies.</p>	<p>CapTel user dials 9-1-1. Sprint will route the call <u>directly</u> to the most appropriate PSAP.</p> <p>The 911 PSAP center will receive the caller's Automated Number Identification and Automated Locator Identification. If the call is disconnected, the 911 center will call the CapTel user back.</p>
<p>§ 64.604 A.5</p>	<p>In-call Replacement of CAs</p> <p>CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of 10 minutes.</p>	<p>Requirement applies.</p>	<p>CapTel CAs stay on all calls for a minimum of 10 minutes.</p>
<p>§ 64.604 A.6</p>	<p>CA Gender Preferences</p> <p>TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.</p>	<p>Waived. (§ 36, 47-48).</p>	
<p>§ 64.604 A.7</p>	<p>STS Called Numbers</p> <p>STS users must be provided the option to</p>	<p>Waived. (§29)</p>	

			users.
§ 64.604 B.4	<p>TRS Facilities</p> <p>TRS shall operate every day, 24 hours a day.</p>	FCC noted that CapTel is not a mandated service but stated that CapTel is a form of enhanced VCO service. It allowed interstate reimbursement from the Interstate TRS Fund. For a provider to be eligible for reimbursement from the Interstate TRS Fund for the provision of TRS, the provider must either meet the mandatory minimum standards or request and receive waivers of the standards. (§ 22, 24)	Sprint CapTel is available 24 hours a day, every day.
§ 64.604 B.5	<p>TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.</p> <p>Adequate network facilities shall be used in conjunction with TRS.</p> <p>Technology</p> <p>No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecomm to people with disabilities.</p> <p>VCO & HCO technology are required to be standard features of TRS.</p>	<p>State TRS programs, of course, are free to offer this service and to reimburse providers of intrastate captioned telephone VCO service. (§ 22).</p> <p>FCC acknowledged that CapTel is an enhanced VCO service of TRS (§ 44).</p> <p>Waived for HCO. (§ 29)</p>	<p>Sprint CapTel has redundancy features that provide functional equivalency, including uninterruptible power for emergency use.</p> <p>Sprint CapTel network facilities are sufficient to ensure that the probability of a busy response due to loop trunk congestion is functionally equivalent to what a voice caller would experience.</p> <p>Sprint is the nation's leader in the development and offering of technological features for TRS</p>
§ 64.604 B.6	<p>Voicemail & Interactive Menus</p> <p>CAs must alert the TRS user to the presence of a recorded message & interactive menu thru a hot key on the CA's terminal.</p>	Requirement applies.	CapTel user both hears and interacts directly with the recorded message and makes the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a

	<p>TRS providers shall electronically capture recorded messages & retain them for the length of the call, & may not impose any charges for additional calls that must be made by the user in order to complete calls involving recorded or interactive messages.</p> <p>TRS will handle pay-per-calls.</p>	Requirement applies.	<p>recording by hearing the recording and seeing the captions of the recording as the message is played.</p> <p>CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The CapTel user interacts with the recorded message system directly. This is treated as one call.</p> <p>Sprint CapTel supports pay-per-call call types.</p>
<p>§ 64.604 C.1</p>	<p>Consumer Complaint Logs</p> <p>States must maintain a log of complaints including all complaints about TRS to include at minimum, the date the complaint was filed, the nature of the complaint, the date of resolution and an explanation of the resolution.</p> <p>States & TRS providers shall submit to the FCC by July 1 of each year, summaries of logs indicating the number of complaints received for the 12-month period ending May 31.</p> <p>Contact Persons</p> <p>States must submit to the FCC a contact person or office for TRS consumer information and complaints about intrastate TRS.</p>	<p>Requirement applies.</p> <p>Requirement applies.</p>	<p>Sprint CapTel maintains a log of all complaints. The log includes all of the required fields including the date, the nature, the date of resolution, and the explanation of resolution.</p> <p>Sprint CapTel provides summaries of the logs, which indicate the number of complaints received for a 12-month period ending May 31st.</p> <p>Sprint CapTel provides full support,</p>

			including a primary point-of-contact, to contract administrators to meet FCC requirements.
Functional Standards			
§ 64.604 C.3	<p>Public Access to Info</p> <p>Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in phone directories, DA services, & incorporation of TTY numbers in phone directories, shall assure that callers are aware of all forms of TRS.</p> <p>Conduct ongoing education and outreach programs to publicize availability of 711 access.</p>	Requirement applies.	Sprint follows all FCC requirements for public access to information and publishes instructions for TRS, including 711 access, in directories, brochures, billing inserts, phone directories and DA services, and incorporates TTY numbers in phone directories to assure that callers are aware of all forms of TRS.
§ 64.604 C.4	<p>Rates</p> <p>TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.</p>	Requirement applies.	CapTel users pay rates no greater than the rates paid for functionally equivalent voice communication services.
§ 64.604 C.5	<p>Jurisdictional Separation of Costs</p> <p>(i) General, where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set for in the Commission's regulations</p> <p>(ii) Cost recovery – Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism</p>	Requirement applies.	<p>(i) Sprint follows FCC requirements in the jurisdictional separation of costs.</p> <p>(ii) Interstate CapTel is recovered from all subscribers of interstate services</p>

	(iii) Telecommunications Relay Services Fund – To be administered by the National Exchange Carrier Association, Inc. (NECA)		(iii) Sprint works with NECA for reimbursement of interstate minutes.
§ 64.604 C.6	Complaints (i) Referral of complaint, (ii) Intrastate complaint resolution, (iii) Jurisdiction of Commission, (iv) Interstate complaint resolution, (v) Complaint Procedures	Requirement applies.	The Sprint CapTel Customer Contact process is fully compliant with all FCC Requirements.
§ 64.604 C.7	Treatment of TRS Customer Info Future contacts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service, and shall not be sold, distributed, shared or revealed in any other way by the relay provider or its employees, unless compelled to do so by lawful order.	Requirement applies.	Sprint transfers CapTel customer data to incoming CapTel vendors. Customer information that is normally contained in a TRS profile is not required for CapTel as the CA is anonymous to the call and the CapTel user talks directly to the called party. The data is provided in usable form at least 60 days prior to the last day of service and is not sold, distributed, shared or revealed in any other way by Sprint, or Sprint employees unless Sprint is compelled by legal process to provide such information.
§ 64.605	State Certification Per FCC's Public Notice on TRS State Re-certification released 5/1/02, the FCC requests an application be submitted through State's Office of the Governor or other delegated executive office empowered to	Requirement applies.	Sprint provides each Sprint TRS state a re-certification packet and assists in the re-certification process.